

MEMORANDUM

LCPA Safety Memorandum Notification

July 31, 2014

In August of 2013, Virginia's foster care records, funded through Title IV-E of the Social Security Act, were audited by the U.S. Department of Health & Human Services Children's Bureau. Although Virginia "passed" this review, there were financial penalties assessed due to our procedures and inability to clearly document compliance with federal safety requirements. Several of the Licensed Child Placing Agencies (LCPA) licensed by Virginia Department of Social Service Division of Licensing Programs (DOLP) were contacted at that time and asked to provide information. The agencies' actions substantially reduced our penalties and provided a good basis for a new process that will prevent future errors. Virginia's plan to correct our reporting processes will be implemented August 1, 2014. The new steps will meet federal requirements and provide a process for validating that the requirements were met. Failure to provide the required information will result in Virginia's inability to claim federal IV-E funds. An informational meeting will be scheduled by the VDSS to explain the requirement and review the new process.

Beginning September 1, 2014, all LCPAs, who accept placement of foster care children, will be required to maintain completed lists of foster parents on a state provided matrix. The matrix template is available in an electronic form on the VDSS website. The matrix data fields include the dates for criminal records and central registry verification and should be completed by August 31, 2014 for a baseline. As new foster parents are approved and existing foster parents leave, the baseline matrix should be updated. The information on the matrix must be supported with copies of the Office of Background Investigation (OBI) criminal record background investigation verification and Central Registry findings verification for each foster parent. This record should be maintained at the LCPA human resources office site(s). Licensing specialist will verify the matrix is complete and that the safety requirements were met. ***Children placed in any home that does not have completed criminal record and central registry verification are not eligible to receive IV-E reimbursement.***

Any verification letter/form provided with a decision of "adequate information is unavailable", must be fully explained with written justification of reason for offering certification of approval. If LCPA is unable to provide the information on review, it will be reported to the VDSS Title IV-E Manager who will notify any local departments with placements to immediately end IV-E funding.

An electronic copy of the baseline matrix should be submitted by the LCPA, to the Virginia Department of Social Services mailbox **CRF Confirmation@dss.virginia.gov**. On a quarterly basis an updated version should be placed in the LCPA files and a copy submitted to VDSS mailbox listed above. The matrix will be reviewed by the licensing specialist during inspections. The information on the matrix, the OBI criminal background investigation letter and Central Registry Verification form will be reviewed to confirm the results of eligibility as a foster home. If the LCPA is unable to provide information on reviews, it will be reported to the VDSS Title IV-E Manager and all local departments with placements will be notified. If VDSS is unable to certify the safety requirements are met then the placement is no longer eligible for IV-E funding.

In addition to VDSS licensing specialist, State IV-E consultants will assist as needed to verify the safety requirements are met. IV-E visits, not made with a licensing specialist, will be announced and coordinated with the LCPA. The goal is to provide oversight and verification that Virginia is ensuring that all safety requirements are met, children are not being placed in unsafe foster homes and appropriate federal funds are claimed. Thanks you for your understanding and support as we work together to ensure that Virginia is fully compliant with all state laws, guidance and federal requirements.